

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS**

MARTIN WALSH Secretary of
Labor, United States Department of Labor,

Plaintiff,

v.

**DAYEMI ORGANIZATION, INC. d/b/a
LONGBRANCH CAFE AND BAKERY**, an
Illinois corporation, and **ELAINE RAMSEYER
GREENBERG**, an individual,

Defendants.

Civil action no.: 21-cv-00056-SMY

**DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO FILE AN AMENDED
MOTIONS IN LIMINE TO CORRECT A TYPOGRAPHICAL ERROR**

NOW COME Defendants, by and through their attorney, Shari R. Rhode of the Rhode Law Firm, and hereby move this honorable Court to allow Defendants to file an Amended Motions in Limine to correct the name of the Declarant mentioned in paragraph 3 which should have been Todd Brown, not William Todd. In support hereof, the undersigned states:

1. Defendants filed their Motions in Limine on June 8, 2022. Doc. 42.
2. On this date, the undersigned recognized the error and contacted Elisabeth Nolte, one of Plaintiff's attorney who advised that Plaintiff had no objection to this Motion.

WHEREFORE, for the reasons set forth herein, Defendants respectfully request that the Court enter an order allowing Defendants to file an Amended Motions in Limine.

Respectfully submitted,

By: /s/Shari R. Rhode
Shari R. Rhode, Attorney for Defendants
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CERTIFICATE OF SERVICE

I certify that on June 9, 2022, a copy of the foregoing Defendants' Motions in Limine were electronically filed with the United States District Court, Southern District of Illinois, via the Court's CM/ECF filing system and also served a copy upon:

Elisabeth Simcox Nolte
Region V | Office of the Solicitor | U.S. Department of Labor
230 S. Dearborn St., Rm. 844 | Chicago, IL 60604
312-353-7837 | nolte.elisabeth.p@dol.gov

/s/ Shari. R. Rhode
Shari R. Rhode